

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

VIAAS INC.,

Plaintiff,

v.

AMAZON.COM, INC. and
RING LLC,

Defendants.

Case No. 6:22-cv-01041-KC

**DECLARATION OF REGAN J. RUNDIO IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS**

I, Regan J. Rundio, declare as follows:

1. I am an associate with the law firm of Morrison & Foerster LLP. I am a member in good standing of the Bar of the State of Texas. I make this declaration based on personal knowledge and, if called as a witness, I could and would testify competently to the matters set forth herein.

2. Attached hereto as Exhibit A is a true and correct copy of the document recorded with the United States Patent and Trademark Office ("USPTO") at Reel 022333, Frame 0479, retrieved on January 29, 2023, from <https://legacy-assignments.uspto.gov/assignments/assignment-pat-22333-479.pdf>.

3. Attached hereto as Exhibit B is a true and correct copy of the document recorded with the USPTO at Reel 029218, Frame 0107, retrieved on January 29, 2023, from <https://legacy-assignments.uspto.gov/assignments/assignment-pat-29218-107.pdf>.

4. Attached hereto as Exhibit C is a true and correct copy of the document recorded with the USPTO at Reel 041069, Frame 0270, retrieved on January 29, 2023, from <https://legacy-assignments.uspto.gov/assignments/assignment-pat-41069-270.pdf>.

5. Attached hereto as Exhibit D is a true and correct copy of the document recorded with the USPTO at Reel 042834, Frame 0050, retrieved on January 29, 2023, from <https://legacy-assignments.uspto.gov/assignments/assignment-pat-42834-50.pdf>.

6. Attached hereto as Exhibit E is a true and correct copy of U.S. Patent Application Publication No. 2013/0057685 A1, as published by the USPTO on March 7, 2013.

7. Attached hereto as Exhibit F is a true and correct copy of the document recorded with the USPTO at Reel 036956, Frame 0886, retrieved on January 29, 2023, from <https://legacy-assignments.uspto.gov/assignments/assignment-pat-36956-886.pdf>.

8. Attached hereto as Exhibit G is a true and correct screenshot of a page of the Texas Secretary of State's website (direct.sos.state.tx.us) retrieved on January 31, 2023. This page shows the business entities registered with the Texas Secretary of State whose names begin with or are similar to "amazon.com."

9. Attached hereto as Exhibit H is a true and correct copy of a letter from Defendants' counsel sent to Plaintiff's counsel via e-mail on January 20, 2023.

10. Attached hereto as Exhibit I is a true and correct copy of an e-mail Defendants' counsel received from Plaintiff's counsel on January 26, 2023.

11. Attached hereto as Exhibit J is a true and correct copy of a document attached to Plaintiff's counsel's January 26, 2023 e-mail, titled "Asset Purchase Agreement between Barracuda Networks, Inc. and VIAAS, Inc. dated as of May 11, 2017." This document contains Attorneys' Eyes Only information and has been filed under seal separately with Defendants' Motion to Seal.

12. Attached hereto as Exhibit K is a true and correct copy of the document recorded with the USPTO at Reel 061377, Frame 0208, retrieved on January 31, 2023, from <https://legacy-assignments.uspto.gov/assignments/assignment-pat-61377-208.pdf>.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 1st day of February, 2023, in Austin, Texas.

/s/ Regan J. Rundio
Regan J. Rundio